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*Attorneys for Defendants C. R. Bard, Inc. and
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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**Joint Motion to Extend the Time to
Submit a Stipulation or Joint Report on
Plaintiffs' and Defendants' Fact Sheets**

In accordance with this Court's February 2, 2016, Case Management Order No. 8 (Doc. 519), the Parties are required by today – March 1, 2016—to file a stipulation or joint submission on the procedure to govern the selection of bellwether cases, which is required to include proposed forms of Plaintiffs' and Defendants' fact sheets. While the parties will be timely filing a joint submission regarding the proposed procedure for selection of bellwether cases and have exchanged proposed fact sheets, they are still negotiating and assessing the scope of the opposing parties' proposed fact sheets and related document requests. Given that the parties are continuing to negotiate with one another in good faith regarding the scope of the fact sheets, the parties respectfully request that the Court extend the time for the Parties to submit a stipulation or joint stipulation on the fact sheets by March 18, 2016. The Parties have submitted a proposed form of Order with this joint motion.

DATED this 1st day of March, 2016.

GALLAGHER & KENNEDY, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2016, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Matthew B. Lerner
Matthew B. Lerner